



**Office of the New York State  
Attorney General**

**Letitia James  
Attorney General**

March 28, 2025

Via ECF

The Honorable Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

USDC SDNY  
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Re: *Mozdziak v. Romeo, et al.*, No. 24 Civ. 8579 (LAK)

Dear Judge Kaplan:

This Office represents Defendants in the above referenced matter. I write, on behalf of both parties, to respectfully request that the initial pre-trial conference, scheduled for April 8, 2025, be adjourned to a date convenient to the Court after April 20, 2025, as counsel for both parties will be out of the country on overlapping, previously scheduled vacations. The parties further request that the Court approve an extension of time for the deadlines regarding Defendants' motion to dismiss the complaint. *See* ECF No. 15. This is the second request to adjourn the initial conference<sup>1</sup> and the parties' first request for additional time regarding the motion.

On March 21, 2025, Defendants moved to dismiss the complaint. *See* ECF No. 15. Per the Court's Individual Rules of Practice regarding motions, pp. 2-3, Plaintiff's opposition is due April 7, 2025, and Defendants' reply is due April 14, 2025. The parties respectfully request the Court set the following deadlines: Plaintiff's opposition, if any, will be due April 30, 2025; Defendants' reply, if any, will be due May 30, 2025.

The parties thank you for your consideration of this request.

Sincerely,

*Granted  
Court calendar  
SO ORDERED  
[Signature]*

/s/ Mark R. Ferguson  
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<sup>1</sup> Plaintiff requested an adjournment of the initial conference in his letter motion, dated December 30, 2024 (ECF No. 6), which the Court granted on December 31, 2024. *See* ECF No. 7.